

DOA Administrative Letter No. 03-13

TO: Area Agency on Aging Administrators
Nutrition Service Providers

SUBJECT: Revised Nutrition Standards

DATE: August 29, 2003

The revised nutrition service standards are enclosed. The revised standards combine all the requirements for both congregate and home-delivered nutrition services into a single set of standards. Federal and state requirements are summarized in bold print. Practice guidelines in regular print are recommendations related to service delivery and program administration.

Changes in the nutrition rules in the NC Administrative Code were issued for comment in August 2002, published in the NC Register in October, and approved by the NC General Assembly in February 2003. Guidance related to changes affecting food preparation bid specification was distributed in March 2003. The following notes are offered as a summary:

- Holding time and temperature requirements – All holding time requirements have been deleted, but providers are strongly encouraged to enter into contracts that limit the amount of time that food spends in transit before it is consumed. Food service now will be judged only on the basis of food temperature requirements issued by the Division of Environmental Health in "Rules Governing the Sanitation of Restaurants and Other Foodhandling Establishments" (15A NCAC 18A .2600). The only exception is where approval has been granted by the local Environmental Health Specialist for certain foods to be judged by time rather than temperature, per section .2609 (h) of the sanitation rules.
- End of production time – Removing holding time requirements from the standards does not change the requirement for food caterers to document the end of preparation time on meal delivery tickets (signed by the food production manager).
- Serving time and temperatures – The revised standards clarify that both serving time and temperature must be recorded for congregate meals. There is no change in the requirement for arrival time to be documented if food is prepared off-site. There is no change in the requirement to document food temperatures at arrival if warming or refrigeration equipment is used to hold food prior to serving. There is no change in the requirement for home-delivered meal temperatures to be documented at least one time per month on each route.

- Food delivery carriers – All food delivery carriers must meet National Sanitation Foundation (NSF) standards (pursuant to the Division of Environmental Health sanitation rules)
- Food containers - Language in the old standards related to the use of aluminum or foam divided containers for hot food has been modified to simply require divided containers with air-tight seals.
- Menu requirements – Menu requirements have been modified to allow a maximum of 1,300 mg of sodium per meal and to require a minimum of 400 mg of calcium per meal. Other changes in the menu requirements include the restriction that a serving of juice may fulfill no more than half of the fruit/vegetable requirement for any one meal and that cranberry juice cocktail may not be used as one of the juices to satisfy the fruit/vegetable requirement. The number of meatless meals in a menu cycle is no longer restricted, as long as the menu pattern is followed.
- Menu substitutions – Caterers must send written notification of menu substitutions on the date of delivery. There is no change in the requirement for a deviation from the approved menu to be documented on a menu change form, signed by the person authorizing the change, with the specific substitution listed. Also, there is no change in the requirement that menu substitutions must be approved by a licensed dietitian/nutritionist within 90 days of serving or no later than July 31st for meals served in the 4th quarter of the state fiscal year.
- Nutrient analysis – The revised standards clarify that a nutrient analysis must be on file with the approved menus.
- Updating CRF for home-delivered meal clients – The revised standards clarify that client registration information on the DOA-101 must be updated at each 6-month reassessment for home-delivered meal clients.
- Staff delivery of meals – The revised standards eliminate the prohibition on staff being used to deliver meals. The Division hopes and expects that nutrition providers will continue to recruit and depend in large part on our current system of volunteers for delivery to homebound clients. However, this change in the rules offers local flexibility in determining what arrangements will serve the best interests of the community. For example, staff may be used to open up new routes while volunteers are being recruited or to serve areas where the agency has a hard time recruiting volunteers.
- Annual survey – The revised standards require rather than recommend that an annual survey of participants be conducted.
- Sanitation grades below grade "A" or 90% – The revised standards provide a procedure for involving the AAA when a sanitation grade falls below "A" or 90%.

- The old standards required nutrition providers to educate participants and staff about the sources and prevention of foodborne illness. The revised standards clarify that this is an annual expectation.
- The revised standards provide information about the Nutrition Services Incentive Program (NSIP), formerly known as the USDA cash and/or commodities program. This program was transferred from USDA to the Administration on Aging in 2003. There are no significant changes in the program as a result of the transfer. The NSIP is intended to provide an incentive for the expanded delivery of nutritious meals to older adults. Meals funded under the Older Americans Act and meals provided through other funding sources that meet certain requirements are eligible for the NSIP subsidy. The NSIP subsidy will continue to be provided automatically for all meals reported under service codes 180 and 020. Providers reporting meals under service codes 181 and 021 should be aware that AoA's new guidance regarding meals funded by other funding sources will not allow reimbursement for meals provided to a person who has been means-tested for eligibility. This means that meals provided under the Medicaid Community Alternatives Program for Disabled Adults (CAP/DA) will not be eligible for the NSIP subsidy.

The revised standards and other resources may be accessed on the Division of Aging nutrition web page: <http://www.dhhs.state.nc.us/aging/meals.htm>.

The Division acknowledges and appreciates the contributions of a number of nutrition service providers and Area Agency on Aging staff in the revision of the state nutrition standards. All members of the nutrition network are invited to attend basic orientation on nutrition program management offered twice per year by the Division of Aging.

Sincerely,

Karen E. Gottovi,
Director

cc: Steve Freedman
Audrey Edmisten
Phyllis Stewart

Attachment – [Nutrition Service Standards](http://www.dhhs.state.nc.us/aging/svcstd/nutrition.pdf)
(<http://www.dhhs.state.nc.us/aging/svcstd/nutrition.pdf>)